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FILED VIA ECF

Hon. Jesse M. Furman
United States District Judge
United States Courthouse
Southern District of New York
500 Pearl Street
New York, New York 10007

January 5, 2022

United States v. Orlando CARMONA-SERRANO
(S10) 16 Cr. 387 (JMF)

Dear Judge Furman:

By Order dated January 3, 2022, 2021 (D.E. 597), the Court directed, *inter alia*, counsel to confer regarding whether and how the next status conference in this matter, currently scheduled for January 20, 2022, is to proceed.

Accordingly, this letter is to advise the Court that counsel have indeed conferred and that we seek an adjournment of approximately sixty (60) days on consent. The purpose of the request is to allow the defense additional time to continue to review the very voluminous discovery produced by the government with his client, as well as to obtain translations of numerous documents. The additional time has, in part, been made necessary by the ongoing COVID-19 pandemic and the prevalence of the Omicron variant. As the Court will be aware, this has led to the reimposition of jail protocols impacting counsel's ability to meet with Mr. Carmona-Serrano.

In conjunction with this request, we ask the Court to adjust the motion schedule previously put in place and consent to an exclusion under the Speedy Trial clock in these circumstances.

For these reasons, we ask that the January 20, 2022 status conference in this matter be adjourned until the late morning or early afternoon, on a date in late March that is convenient for the Court.

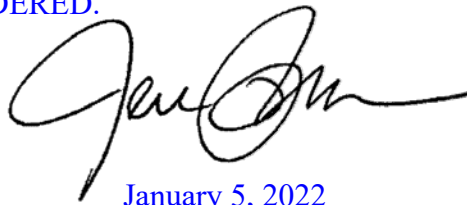
Finally, Mr. Carmona-Serrano is prepared to waive his right to attend altogether. It is counsel's understanding that the Constitution, the Federal Rules and the CARES Act so permit.

Respectfully submitted,

/s/
HOWARD LEADER

cc: Adam Hobson, Esq.,
Assistant United States Attorney (VIA ECF)

Application GRANTED. Defense motions shall be filed by March 25, 2022. The Government's opposition is due by April 8, 2022. Any reply is due by April 15, 2022. The pretrial conference is hereby ADJOURNED to March 30, 2022 at 3:15 p.m. Time is excluded under the Speedy Trial Act from today, January 5, 2022, until March 30, 2022, to allow Defendant to review the voluminous discovery and prepare any motions to be filed. The Clerk of Court is directed to terminate Doc. #598. SO ORDERED.

A handwritten signature in black ink, appearing to read "J. Lee", is written over the date. The signature is fluid and cursive.

January 5, 2022